

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation of
Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

ARNOLD SHAPIRO 11/9/96 TRUST; FIRST
MARITAL TRUST UNDER THE ARNOLD
SHAPIRO TRUST 11/9/96 TRUST; SECOND
MARITAL TRUST UNDER THE ARNOLD
SHAPIRO 11/9/96 TRUST; DOUGLAS SHAPIRO,
in his capacity as Successor Trustee for the Arnold
Shapiro 11/9/96 Trust and in capacity as Trustee for
the First Marital Trust under the Arnold Shapiro
11/9/96 Trust and the Second Marital Trust under the
Arnold Shapiro 11/9/96 Trust; MURIEL SHAPIRO,
in her capacity as Successor Trustee of the Arnold
Shapiro 11/9/96 Trust; and ALAN ABRAMSON, in
his capacity as Successor Trustee of the Arnold
Shapiro 11/9/96 Trust and in his capacity as Trustee
for the First Marital Trust under the Arnold Shapiro
11/9/96 Trust and the Second Marital Trust under the
Arnold Shapiro 11/9/96 Trust,

Defendants.

Adv. Pro. No. 10-05053 (SMB)

STIPULATION EXTENDING TIME TO CONCLUDE MEDIATION

This Stipulation Extending Time to Conclude Mediation (“Stipulation”) is submitted pursuant to the Bankruptcy Court’s Order entered November 10, 2010 (1) Establishing Litigation Case Management Procedures for Avoidance Actions and (2) Amending the February 16, 2010 Protective Order (“Case Management Procedures Order”).

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned herein, that the time by which the Parties must conclude mediation in the above-captioned case is extended up to and including November 20, 2015.

The purpose of this Stipulation is to provide additional time for the Parties to resolve this matter through the mediation process as contemplated under the Case Management Procedures Order.

Except as expressly set forth herein, the parties to this Stipulation reserve all rights and defenses they may have, and entry into this Stipulation shall not impair or otherwise affect such rights and defenses, including without limitation any defenses based on lack of jurisdiction.

This Stipulation may be signed by the parties in any number of counterparts, each of which when so signed shall be an original, but all of which shall together constitute one and the same instrument. A signed facsimile, photostatic or electronic copy of this Stipulation shall be deemed an original.

Dated: October 12, 2015
New York, New York

/s/Nicholas J. Cremona

Baker & Hostetler LLP
45 Rockefeller Plaza
New York, NY 10111
Telephone: 212.589.4200
Facsimile: 212.589.4201
David J. Sheehan
E-mail: dsheehan@bakerlaw.com
Nicholas J. Cremona
E-mail: ncremona@bakerlaw.com

*Attorneys for Irving H. Picard
Trustee for the Substantively Consolidated
SIPA Liquidation of Bernard L. Madoff
Investment Securities LLC and the Estate of
Bernard L. Madoff*

/s/Brendan M. Scott

Klestadt Winter Jureller Southard &
Stevens, LLP
570 Seventh Avenue, 17th Floor
New York, NY 10018-6314
Telephone: 212.972.3000
Tracy L. Klestadt
tklestadt@klestadt.com
Brendan M. Scott
bscott@klestadt.com

*Attorneys for Arnold Shapiro 11/9/96
Trust; First Marital Trust Under Arnold
Shapiro 11/9/96 Trust; Second Marital
Trust Under Arnold Shapiro 11/9/96
Trust; Douglas Shapiro, in his capacity as
Successor Trustee for the Arnold Shapiro
11/9/96 Trust and in his capacity as Trustee
for the First Marital Trust Under the Arnold
Shapiro 11/9/96 Trust and the Second
Marital Trust Under the Arnold Shapiro
11/9/96 Trust; Muriel Shapiro, in her
capacity as Successor Trustee of the Arnold
Shapiro 11/9/96 Trust; and Alan Abramson,
in his capacity as Successor Trustee for the
Arnold Shapiro 11/9/96 Trust and in his
capacity as Trustee for the First Marital
Trust Under the Arnold Shapiro 11/9/96
Trust and the Second Marital Trust Under
the Arnold Shapiro 11/9/96 Trust*